

## IN THE UNITED STATES DISTRICT COURT

## FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:  
ALL CASES

**DECLARATION OF ROOPAL P. LUHANA  
IN SUPPORT OF ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL  
SHOULD BE FILED UNDER SEAL**

I, Roopal P. Luhana, declare:

1. I am a partner of Chaffin Luhana, LLP, an attorney licensed in the State of New York, and duly admitted to practice before this Court *pro hac vice*, representing Plaintiffs in the above caption action. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. Because the materials at issue were designated confidential by Uber, Plaintiffs filed the following under seal:

| Document  | Description                                   | Designating Party |
|---|---|-------------------|
| Exhibit A to the Declaration of B. Wilkins in support of Plaintiffs' Statement in Joint Discovery Brief | References to information deemed confidential | Uber              |
| Exhibit B to the Declaration of B. Wilkins in support of Plaintiffs' Statement in Joint Discovery Brief | References to information deemed confidential | Uber              |
| Exhibit C to the Declaration of B. Wilkins in support of Plaintiffs' Statement in Joint Discovery Brief | References to information deemed confidential | Uber              |
| Exhibit D to the Declaration of B. Wilkins in support of  | References to information deemed confidential | Uber              |

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|---|---|---|------|
| 1 | Plaintiffs' Statement in Joint Discovery Brief  |   |      |
| 2 | Exhibit E to the Declaration of B. Wilkins in support of Plaintiffs' Statement in Joint Discovery Brief | References to information deemed confidential | Uber |
| 3 | Exhibit F to the Declaration of B. Wilkins in support of Plaintiffs' Statement in Joint Discovery Brief | References to information deemed confidential | Uber |
| 4 | Exhibit G to the Declaration of B. Wilkins in support of Plaintiffs' Statement in Joint Discovery Brief | References to information deemed confidential | Uber |
| 5 | Exhibit H to the Declaration of B. Wilkins in support of Plaintiffs' Statement in Joint Discovery Brief | References to information deemed confidential | Uber |

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 15<sup>th</sup> day of September, 2025 in Brooklyn, New York.

/s/ Roopal P. Luhana  
Roopal P. Luhana